

**REMARKS**

At the outset, the Examiner is thanked for the thorough review and consideration of the pending application. The Non-Final Office Action dated August 29, 2003 has been received and its contents carefully reviewed.

Claims 1-16 are pending in the current application. Applicants thank the Examiner for allowing claims 1 and 7-10. Applicants also thank the Examiner for indicating that claims 11 and 16 contain allowable subject matter. Applicant adds new claim 17 to provide an alternate scope of coverage for Applicants' invention in the claims.

Claims 2 and 3 are rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter the subject invention. Applicants amend claims 2 and 13 to explicitly recite the shape of the fine pattern. Accordingly, these amendments overcome this rejection, and the allowance of claims 2 and 13 is hereby requested.

Claim 3 is rejected under 35 U.S.C. § 103(a) as being unpatentable over US Patent 6,025,981 to Kim in view of US Patent 6,365,303 to Hung et al. Claims 2, 4-6, and 12-15 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Kim in view of Hung and further in view of US Patent 6,265,756 to Brockett et al.

The rejection of claims 2-6 and 12-15 is respectfully traversed and reconsideration is hereby requested. Claims 2-6 and 12-15 are allowable over the cited references in that each of these claims recites a combination of elements not taught, disclosed, or suggested by the cited

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The structure of Hung is different from the structure of the claimed invention in that none of the ESD fingers of Hung connects the projections as required by the claim. In particular, the fingers 36 and 38 are not connected to the metal regions 30 and 34, respectively. (Hung, column 3, lines 4-25 and Figures 3 and 4). The Examiner does not allege that Brockett discloses or suggest this feature.

Because the references cited by the Examiner do not teach, disclose, or suggest at least this feature of claim 2, claim 2 is allowable over the cited references at least for this reason.

Claim 3 recites a feature of “a plurality of lighting rod patterns between the shorting bar pattern and each of the pad patterns.” The cited references do not teach, disclose, or suggest this feature of claim 3 at least for those reasons discussed above with respect to claim 2. Accordingly, Applicants respectfully submit that claim 3, and claim 4 which depends from claim 3, are allowable over the cited references.

Similarly, one of the features of Applicant’s invention as claimed in claim 5 is “a fine pattern connected between centers of the projections.” At least for those reasons discussed above with respect to claim 2, the cited references Kim, Hung, and Brockett do not teach, disclose or suggest this feature of claim 5. Accordingly Applicants respectfully submit that claim 5, and claim 6 which depends from claim 5, are allowable over the cited references.

In addition claims 12, 13 and 15 are allowable over the cited references in that these claims recite a feature of a “fine pattern connecting the inner lightning rod projection to the outer lightning rod projection.” At least for the reasons discussed above with respect to claim 2, none of the cited references teaches, discloses, or suggests at least this feature of these claims.

Applicants believe the foregoing amendments and remarks place the application in condition for allowance and early, favorable action is hereby solicited.

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue.

If these papers are not considered timely filed by the Patent and Trademark Office, then a petition is hereby made under 37 C.F.R. §1.136, and any additional fees required under 37 C.F.R. § 1.136 for any necessary extension of time, or any other fees required to complete the filing of this response, may be charged to Deposit Account No. 50-0911. Please credit any overpayment to deposit Account No. 50-0911. A duplicate copy of this sheet is enclosed.

Dated: November 26, 2003

Respectfully submitted,

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